C. REMARKS

The Examiner is thanked for the performance of a thorough search. The election of Group I claims (Claims 1-26, 32, 34, 36, 38, 40, 42, and 46), as specified during a telephone conversation between Examiner Ehichioya and Mr. Palermo, is hereby affirmed without traverse. Claims 1-4, 6-14, 16-23, 25, 32, 34, 36, 38, 40, 42, and 44 have been amended as indicated by the amendments above. Claim 46 has been cancelled. Claims 27-31, 33, 35, 37, 39, 41, 43, and 45 have been withdrawn. Hence, Claims 1-26, 32, 34, 36, 38, 40, 42, and 44 are pending in this application. The amendments to the claims do not add any new matter to this application, but instead clarify features already extant in the claims.

The Office Action objected to Drawings 4C and 4F. New, formal versions of Drawings 4C, 4D, 4E, 4F, 4G, 4H are submitted herewith.

All other issues raised in the Office Action mailed March 25, 2004 are addressed hereinafter.

REJECTION OF CLAIMS 1-26, 32, 34, 36, 38, 40, 42, and 44

UNDER 35 U.S.C. § 103(a)

Claims 1-26, 32, 34, 36, 38, 40, 42, and 44 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent 6,085,187, naming *Carter* et al. as inventors, in view of U.S. Patent 6,230,173, naming *Ferrel* et al. as inventors (hereafter referred to as "*Carter* in view of *Ferrel*" and separately as "*Carter*" and "*Ferrel*"). It is respectfully submitted that Claims 1-26, 32, 34, 36, 38, 40, 42, and 44, as amended or originally presented, are patentable over *Carter* and *Ferrel*, alone or in combination, for at least the reasons provided hereinafter.

CLAIM 1

Claim 1, as amended, describes a method of relating data stored in one or more content management systems for an enterprise that requires:

> "managing a first information object data structure corresponding to a first information object wherein the first information object is data stored in a file;
> managing a first concept data structure corresponding to a first concept;
> managing a second concept data structure corresponding to a second concept;
> managing a first relationship data structure, wherein the first relationship data structure comprises a first reference to the first concept data structure and a second reference to the second concept data structure;
> managing a second relationship data structure, wherein the second relationship data structure comprises a third reference to the first concept data structure and a fourth reference to the first information object data structure;
> receiving a request for a document referring to the second concept; and
> generating the document referring to the second concept based on a set of information, wherein the set of information comprises the first relationship data structure, the second relationship data structure, the first information object data structure, and the first information object."

It is respectfully submitted that Claim 1 includes one or more limitations that are not taught or suggested by *Carter* in view of *Ferrel*. For example, Claim 1 features "generating the document referring to the second concept based on a set of information, wherein the set of information comprises the first relationship data structure, the second relationship data structure, the first information object data structure, and the first information object." This feature is not taught or suggested by *Carter*, *Ferrel*, or a combination of the two.

In the cited sections, *Carter* teaches displaying a hierarchy of terms in a tree structure. *Carter* does not teach generating a document based on a set of information, wherein the set of information describes the interrelation among at least two concepts and an information object. For example, in one embodiment of Claim 1, an information object (e.g. a "Features" document) is referred to by a first information object data structure. The first and second concept data structures refers to first and second concepts, respectively (e.g. a product home webpage concept

and a product manual concept). The first and second relationship data structures store relationships between the first concept and each of the information object and the second concept. When a user requests a document referring to the second concept (the product manual document), the example embodiment of Claim 1 generates the document for the second concept based on the first relationship data structure, the second relationship data structure, the first information object data structure, and the first information object. Therefore, whereas the product manual document (second concept) is not directly associated with the features document (first information object), the product manual document will still be generated based at least in part on the features document.

Carter, however, teaches no such feature. In fact, *Cater* does not even teach, in the cited section or elsewhere, displaying an information object, let alone "generating the document referring to the second concept based on a set of information, wherein the set of information comprises the first relationship data structure, the second relationship data structure, the first information object data structure, and the first information object."

As with *Carter*, *Ferrel* does not teach "generating the document referring to the second concept based on a set of information, wherein the set of information comprises the first relationship data structure, the second relationship data structure, the first information object data structure, and the first information object." The cited sections, and *Ferrel* in general, describes the use of format templates and style sheets, which together define format, style, and content to include in a document. In *Ferrel* the content for a particular document is defined specifically. For example, *Ferrel* states that "[t]he system keeps track of links between a piece of content and its associated page layout." [*Ferrel*, column 6, lines 57-60] *Ferrel* enables the dynamic formatting of content in a document based on different style sheets, but does not teach utilizing

relationships among concepts in order to determine *which* information objects to display on a page. Therefore, *Ferrel* could not possibly teach "generating the document referring to the second concept based on a set of information, wherein the set of information comprises the first relationship data structure, the second relationship data structure, the first information object data structure, and the first information object."

The Office Action states that: "It would have been obvious to one skilled in the art at the time the invention was made to combine the teachings of *Ferrel* with the teachings of *Carter* wherein the objects that manage the content always have direct incremental access to their piece of storage. The motivation is that there is better performance when incremental objects are written to storage." Applicants disagree. *Ferrel* describes a system for formatting content of documents based on style sheets. *Carter* teaches displaying a hierarchy of terms in a tree structure. Nowhere in either reference is there a suggestion to combine the two. The Office Action states that having "incremental access" (as described in *Ferrel*, column 2, lines 19-32) to content would suggest that *Ferrel* should be combined with *Carter*. This is incorrect. *Carter* does not teach retrieving information objects. Therefore, *Carter* could not reasonably be modified to have incremental access to information objects on disk. Since the reason for combining given in the Office Action cannot be applied to *Carter*, it is hereby respectfully submitted that sufficient suggestion to combined the references has not been given, and, therefore, that the rejection of Claim 1 is improper.

For at least the reasons stated above, it is respectfully submitted that *Carter* in view of *Ferrel* does not teach, disclose, or suggest the subject matter of Claim 1.

CLAIMS 2-26

Claims 2-26 all depend directly or indirectly from Claim 1 and include all of the limitations of Claim 1. Because each of Claims 2-26 includes the limitations of Claim 1, upon which it depends, Claims 2-26 are patentable over *Carter* in view of *Ferrel* for at least the reasons set forth herein with respect to Claim 1.

In addition, Claims 2-26 introduce additional limitations that independently render them patentable. However, due to the fundamental difference already identified, a separate discussion of those limitations is not included at this time in order to expedite the favorable resolution of this case.

CLAIMS 34, 38

Although Claims 1, 34, and 38 are not the same, because the Office Action has applied the same reasoning for each of Claims 1, 34, and 38, the remarks stated above for Claim 1 are equally applicable to Claims 34 and 38. Accordingly, Claims 34 and 38 are patentable over the references for the same reasons given above for Claim 1.

CLAIM 42

Although Claims 1 and 42 are not the same, because the Office Action has applied similar reasoning for each of Claims 1 and 42, the remarks stated above for Claim 1 are equally applicable to Claim 42. Accordingly, Claim 42 is patentable over the references for the same reasons given above for Claim 1.

CLAIMS 32, 36, 40, and 44

Claim 32, 36, 40, and 44, as amended, are dependant claims of Claim 1, 34, 38, or 42, respectively, and each includes all limitations of the claim on which it depends. It is therefore respectfully submitted that each of Claims 32, 36, 40, and 44 is patentable over *Carter* in view of *Ferrel* for at least the reasons set forth with respect to its base claim. Because each of Claims 32, 36, 40, and 44 includes the limitations of the claim upon which it depends, each of Claims 32, 36, 40, and 44 is patentable for at least those reasons given above for the claim upon which it depends.

In addition, Claims 32, 36, 40, and 44 introduce additional limitations that independently render them patentable. However, due to the fundamental difference already identified, a separate discussion of those limitations is not included at this time in order to expedite the favorable resolution of this case.

MISCELLANEOUS REMARKS

It is believed that all issues raised in the Office Action are fully addressed herein. Furthermore, it is respectfully submitted that all of the pending claims are in condition for allowance and the issuance of a notice of allowance is respectfully requested. A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

The Examiner is invited to contact the undersigned by telephone if the Examiner believes that such contact would be helpful in furthering the prosecution of this application.

Respectfully submitted,
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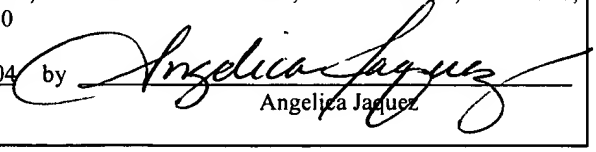
on July 22, 2004 by 
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